

Jahan C. Sagafi (Cal. Bar No. 224887)  
[jsagafi@outtengolden.com](mailto:jsagafi@outtengolden.com)  
OUTTEN & GOLDEN LLP  
One Embarcadero Center, 38th Floor  
San Francisco, California 94111  
Telephone: (415) 638-8800  
Facsimile: (415) 638-8810

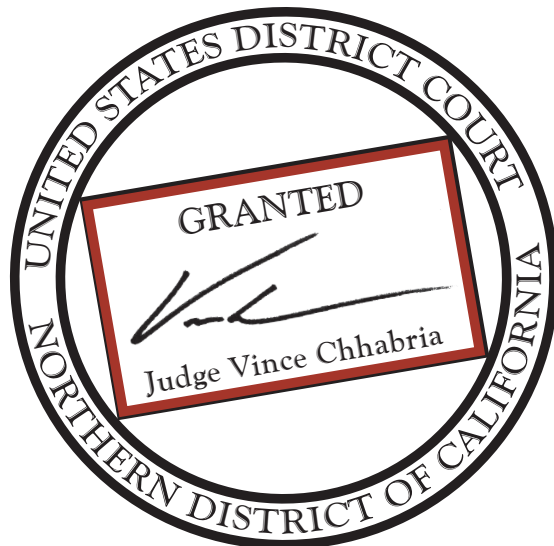
Michael N. Litrownik (admitted *pro hac vice*)  
[mlitrownik@outtengolden.com](mailto:mlitrownik@outtengolden.com)  
Deirdre Aaron (admitted *pro hac vice*)  
[daaron@outtengolden.com](mailto:daaron@outtengolden.com)  
3 Park Avenue, 29th Floor  
New York, New York 10016  
Telephone: (212) 245-1000  
Facsimile: (646) 509-2060

Jason C. Marsili (SBN 233980)  
[jmarsili@posner-rosen.com](mailto:jmarsili@posner-rosen.com)  
Brianna M. Primoizic (SBN 274397)  
[bprimoizic@posner-rosen.com](mailto:bprimoizic@posner-rosen.com)  
POSNER & ROSEN LLP  
3600 Wilshire Boulevard, Suite 1800  
Los Angeles, California 90010  
Telephone: (213) 389-6050  
Facsimile: (213) 389-0663

*Attorneys for Plaintiffs and proposed  
Collective and Class Members*

Thomas R. Kaufman (Cal. Bar. No. 177936)  
[tkaufman@sheppardmullin.com](mailto:tkaufman@sheppardmullin.com)  
Paul Berkowitz (Cal Bar. No. 251077)  
[pberkowitz@sheppardmullin.com](mailto:pberkowitz@sheppardmullin.com)  
Michael T. Campbell (Cal. Bar No. 293376)  
[mcampbell@sheppardmullin.com](mailto:mcampbell@sheppardmullin.com)  
SHEPPARD, MULLIN, RICHTER &  
HAMPTON LLP  
1901 Avenue of the Stars, Suite 1600  
Los Angeles, California 90067-6055  
Telephone: (310) 228-3700  
Facsimile: (310) 228-3701

*Attorneys for Defendant AT&T Services, Inc.*



UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

ANTHONY URETA and MARILYN  
DITO, individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

AT&T SERVICES, INC.,

Defendant.

Case No. 15-cv-03653-VC

**STIPULATION OF THE PARTIES  
CONCERNING AMENDMENT OF  
COMPLAINT**

1 The parties, through their undersigned attorneys, hereby stipulate as follows:

2 1. The undersigned parties are counsel of record in the above captioned action that  
3 has been filed by Plaintiff Anthony Ureta ("Ureta") against Defendant AT&T Services, Inc.  
4 ("AT&T") asserting exempt misclassification of a proposed collective and a proposed class of  
5 AT&T Training Specialists.

6 2. On October 29, 2015, Defendant filed a Motion to Strike Class Allegations  
7 Pursuant to Rule 12(f) or, in the alternative, Rule 23(d)(1)(D).

8 3. Plaintiffs have agreed not to oppose Defendant's Motion, but instead to file a  
9 Second Amended Complaint defining the proposed collective and class[es] to expressly exclude  
10 any AT&T employees who were presented with and did not timely opt out of AT&T's  
11 Management Arbitration Agreement ("MAA"). The filing of the Complaint will render AT&T's  
12 motion to strike moot.

13 4. The limitation in the previous paragraph shall not apply as to Plaintiffs' PAGA  
14 claims, which shall be asserted on behalf of California employees who worked for AT&T in  
15 California during the relevant limitations period irrespective of whether those employees are  
16 bound by the MAA.

17 5. AT&T has also agreed that the Second Amended Complaint will add Wendell  
18 Walton as a proposed class representative, and will define separate subclasses for Training  
19 Specialists employed as Designers and Deliverers.

20 6. AT&T reserves the right to file a responsive pleading of its choice to Plaintiffs'  
21 Second Amended Complaint.

22 **SO STIPULATED.**

23 Dated: November 9, 2015

24 By: /s/ Jahan C. Sagafi  
Jahan C. Sagafi

25 **OUTTEN & GOLDEN LLP**

26 Jahan C. Sagafi (Cal. Bar No. 224887)  
27 One Embarcadero Center, 38th Floor  
28 San Francisco, CA 94111  
Telephone: (415) 638-8800  
Facsimile: (347) 390-2187

Michael N. Litrownik (admitted *pro hac vice*)  
Deirdre Aaron (admitted *pro hac vice*)  
3 Park Avenue, 29th Floor  
New York, NY 10016  
Telephone: (212) 245-1000  
Facsimile: (646) 509-2060

Jason C. Marsili (Cal. Bar No. 233980)  
Brianna M. Primoizic (Cal. Bar No. 274397)  
**POSNER & ROSEN LLP**  
3600 Wilshire Boulevard, Suite 1800  
Los Angeles, CA 90010  
Telephone: (213) 389-6050  
Facsimile: (213) 389-0663

*Attorneys for Plaintiff and proposed Collective and Class Members*

Dated: November 9, 2015

By: /s/ Thomas R. Kaufman  
Thomas R. Kaufman

**SHEPPARD, MULLIN, RICHTER & HAMPTON  
LLP**

Thomas R. Kaufman (Cal. Bar. No. 177936)  
Paul Berkowitz (Cal Bar. No. 251077)  
Michael T. Campbell (Cal. Bar No. 293376)  
1901 Avenue of the Stars, Suite 1600  
Los Angeles, California 90067-6055  
Telephone: (310) 228-3700  
Facsimile: (310) 228-3701

*Attorneys for Defendant AT&T Services, Inc.*

**ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), the filer of this document attests that concurrence in the filing of this document has been obtained from the other signatory above.

Dated: November 9, 2015

By: /s/ Jahan C. Sagafi  
Jahan C. Sagafi